

February 13, 2017

*VIA ELECTRONIC FILING*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**Re: SES Americom, Inc. and O3b Limited, Notice of *Ex Parte* Presentation  
Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al., GN  
Docket No. 14-177; IB Docket Nos. 15-256 & 97-95; RM-11664; WT Docket  
No. 10-112**

Dear Ms. Dortch:

On February 9, 2017, Suzanne Malloy, Vice President, Regulatory Affairs of O3b Networks (“O3b”), Petra Vorwig, Senior Legal and Regulatory Counsel of SES Americom, Inc. (“SES”), Zach Rosenbaum, Director of Spectrum of O3b, Philippe Secher, Senior Manager Spectrum Management & Development of SES, Will Lewis, Regulatory Counsel of O3b and Karis Hastings of SatCom Law LLC, counsel to SES and O3b, met separately with Rachael Bender of Chairman Pai’s office; Daudeline Meme of Commissioner Clyburn’s office; and Erin McGrath in Commissioner O’Rielly’s office.

The meetings focused on SES and O3b’s position on issues in the above-captioned proceeding of particular importance to both geostationary orbit and non-geostationary Fixed Satellite Service (“FSS”) operators generally. The discussion centered on the issues involving the 27.5-28.35 GHz band (the “28 GHz band”), the 40-42 GHz band (the “40 GHz band”) and the 47.2-50.2 GHz band (the “47 GHz band”).

Specifically, SES and O3b discussed proposed revisions to the earth station siting requirements in Section 25.136 put forth in the companies’ joint petition for reconsideration, highlighting the additional flexibility it would offer satellite operators.

SES and O3b also discussed the bands raised in the Spectrum Frontiers Further Notice of Proposed Rulemaking (“FNPRM”), noting that both the 40 GHz and 47 GHz bands are allocated for FSS primary use. SES and O3b reviewed the positions put forth in their respective FNPRM filings. SES and O3b also emphasized that these bands are critical FSS expansion bands and asked that the Commission carefully consider the next steps taken in these bands. In addition, the parties encouraged the Commission to permit broader FSS use of the 24.75-25.25 GHz spectrum.

Please contact me if you have questions about this submission.

Respectfully submitted,

**O3b Limited**

/s/ Suzanne Malloy  
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cc: Rachael Bender  
Daudeline Meme  
Erin McGrath